

1 HEATHER E. WILLIAMS, CA Bar #122664  
Federal Defender  
2 ERIN SNIDER, CA Bar #304781  
Assistant Federal Defender  
3 Office of the Federal Defender  
2300 Tulare Street, Suite 330  
4 Fresno, CA 93721-2226  
Telephone: (559) 487-5561  
5 Fax: (559) 487-5950

6 Attorneys for Defendant  
KENNETH GOULD  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 KENNETH GOULD,

15 Defendant.  
16

Case No. 1:21-cr-00243-JLT-SKO

**STIPULATION TO CONTINUE STATUS  
CONFERENCE; ORDER**

Date: November 30, 2022

Time: 1:00 p.m.

Judge: Hon. Sheila K. Oberto

17 IT IS HEREBY STIPULATED by and between the parties through their respective  
18 counsel, Assistant United States Attorney Joseph Barton, counsel for plaintiff, and Assistant  
19 Federal Defender Erin Snider, counsel for Kenneth Gould, that the status conference currently  
20 scheduled for August 3, 2022, at 1:00 p.m. may be continued to November 30, 2022, at 1:00 p.m.

21 The parties agree and request that the Court make the following findings:

- 22 1. By previous order, this matter was set for a status conference on August 3, 2022.
- 23 2. The government has produced 21,658 bates-marked items in this matter.
- 24 3. Counsel for Mr. Gould requires additional time to review discovery, consult with  
25 her client regarding the case, and conduct necessary investigation.
- 26 4. Counsel for Mr. Gould believes that failure to grant the above-requested  
27 continuance would deny her the reasonable time necessary for effective preparation, taking into  
28 account the exercise of due diligence.

1           5.       The government does not object to the continuance.

2           6.       Based on the above-stated findings, the ends of justice served by continuing the  
3 case as requested outweigh the interest of the public and the defendant in a trial within the  
4 original date prescribed by the Speedy Trial Act.

5           7.       For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
6 *et seq.*, within which trial must commence, the time period of August 3, 2022, to November 30,  
7 2022, inclusive, is excludable pursuant to 18 U.S. C. § 3161(h)(7)(A) and (B)(iv).

8           **IT IS SO STIPULATED.**

9                               Respectfully submitted,

10                              PHILLIP A. TALBERT  
11                              United States Attorney

12       Date: July 27, 2022

13                              /s/ Joseph Barton  
14                              JOSEPH BARTON  
15                              Assistant United States Attorney  
16                              Attorney for Plaintiff

17                              HEATHER E. WILLIAMS  
18                              Federal Defender

19       Date: July 27, 2022

20                              /s/ Erin Snider  
21                              ERIN SNIDER  
22                              Assistant Federal Defender  
23                              Attorney for Defendant  
24                              KENNETH GOULD

25                              **ORDER**

26           **IT IS SO ORDERED.** The status conference currently scheduled for August 3, 2022, at  
27 1:00 p.m. is hereby continued to November 30, 2022, at 1:00 p.m.  
28

29       Date: 8/1/2022

30                              Sheila K. Oberto  
31                              Hon. Sheila K. Oberto  
32                              United States District Judge